

**EXHIBIT D**

**Excerpts from 8/30/2013 Deposition of Kevyn D. Orr**

**In The Matter Of:**

*City of Detroit*

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*Kevyn Orr*

*August 30, 2013*

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**Bingham Farms/Southfield • Grand Rapids**  
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1 not the City might have billions of dollars of art  
2 sitting in its art institute; is that your testimony?

3 A. No. My testimony is that I understand it as valuable.  
4 The exact value of it is to be determined.

5 Q. And you made no effort to sell any of that art prior  
6 to engaging in the negotiations with the Swap  
7 counterparties, correct?

8 A. No. That's true.

9 Q. What about federal aid? Did you attempt -- did you  
10 attempt to obtain federal aid prior to the June 4  
11 commencement of negotiations with the Swap  
12 counterparties?

13 A. I don't know if it was prior to or around that time.  
14 It may have been. We may have sought federal aid  
15 prior to that.

16 Q. And you conveyed the seriousness of the situation to  
17 whomever you spoke to at the federal government?

18 A. Yes, I believe the federal government was aware of the  
19 seriousness of the situation.

20 Q. And the federal government was also unwilling to  
21 provide aid to the City of Detroit; is that your  
22 testimony?

23 A. Yes, direct aid.

24 Q. Let me ask you some questions about the service  
25 corporations. The service corporations are two

1           entities that have long names that I'll only say to  
2           you if you want -- really want me to.

3       A.    We'll stipulate I know what you mean by the service  
4           corporations.

5       Q.    And there are two of them?

6       A.    There are two.

7       Q.    Okay.

8       A.    Police and Fire General Services.

9       Q.    There you go.  So you already know them and you said  
10           the names.  So the two service corporations are  
11           parties to the forbearance agreement, correct?

12      A.    Yes.

13      Q.    And Mr. Buckfire testified yesterday, I'll represent  
14           to you, that his understanding is that you directed  
15           the service corporations to execute the forbearance  
16           agreement and they did so; is that correct?

17      A.    No.

18      Q.    Okay.  Were there arms' length negotiations with the  
19           service corporations?

20      A.    To the best of my knowledge, there was.

21      Q.    And who led those?

22      A.    I'm not quite sure.  I know that -- in response to  
23           your question, I did not direct a service corporation.  
24           They were organized by the City.  And they are managed  
25           by City employees, but I had no direct -- I gave no

1 direct instruction to either of the service  
2 corporations.

3 Q. Okay. So my question was about negotiations with the  
4 service corporations.

5 A. Right.

6 Q. Who conducted the arms' length negotiations with the  
7 service corporations on behalf of the City?

8 A. I'm not sure.

9 Q. Well, you know it wasn't you?

10 A. Yes, it wasn't me.

11 Q. And did you ever direct Mr. Buckfire to engage in  
12 direct negotiations with the service corporations?

13 A. No. I directed Mr. Buckfire to do whatever needed to  
14 get done to get the agreement in principle resolved  
15 and signed. That's what I did, but I did -- said  
16 nothing specific. Just to be responsive to your  
17 question, said oh, go talk to the service  
18 corporations, there was nothing that specific.

19 Q. So to the extent there was a negotiation that needed  
20 to be had, it was his job to go have it?

21 A. It was his or someone else on my -- on my  
22 reorganization team's job, yeah, sure.

23 Q. Well, did you direct anyone else on your team to go  
24 negotiate with the service corporations?

25 A. No. Once we reached an agreement in principle, I